

# EXHIBIT 3

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA  
PITTSBURGH DIVISION**

GAYL WEINMANN, Individually and for  
Others Similarly Situated,

v.

CONTRACT LAND STAFF, LLC

Case No. 2:22-CV-1140

Collective Action (29 U.S.C. § 216(b))

Class Action (Fed. R. Civ. P. 23)

**DECLARATION OF RICHARD M. SCHREIBER**

Pursuant to 28 U.S.C. § 1746, Richard M. Schreiber hereby declares as follows:

1. My name is Richard M. Schreiber and the facts contained in this declaration are within my personal knowledge and are true and correct.

2. I submit this declaration in support of Weinmann's Motion for Class Certification.

3. Since July 2017, I have been an attorney with Josephson Dunlap, LLP. Josephson Dunlap is an employment law firm with a national practice representing plaintiffs and specializing almost exclusively on cases involving violations of the FLSA and state wage and hour laws.

4. I have been a member in good standing of the Texas State Bar since 2006. I am admitted to the First and Fifth Circuit Courts of Appeal. I am admitted in Federal Courts throughout Texas, Oklahoma, Illinois, Michigan, Colorado, North Dakota, and New Mexico. I have been admitted *pro hac vice* in Federal Courts throughout Pennsylvania, Ohio, California, Louisiana, Colorado, New York, Washington, Utah, Virginia, North Carolina, Georgia, South Carolina, West Virginia, Florida, Michigan, Minnesota, and Arizona. I have never been disciplined by any state. I have never been denied *pro hac vice* admission in any court and I have never had my *pro hac vice* admission revoked. Nor has a Court ever declined to certify a class or collective action based on me or my firm's adequacy as class counsel.

5. I have been counsel to over 250 wage and hour cases, most of which are multi-plaintiff actions. In my career, I've argued over a hundred motions, and taken or defended over 200 depositions. The majority of my work in the last 6 years has been focused on representing FLSA plaintiffs and claimants in class actions, collective actions, and arbitrations. Josephson Dunlap as a firm, has been counsel to 1000s of wage and hour collective and class actions.

6. In my practice, I have litigated cases on behalf of workers in wage and hour cases and collective actions against the most respected firms in the United States. These firms include but are not limited to Seyfarth Shaw; Littler Mendelson; Morgan, Lewis & Bockius, Ogletree Deakins; Duane Morris; Munger, Tolles & Olson LLP; Jones Walker, Jackson Lewis, Norton Rose, and Locke Lorde.

7. Partner, Andrew Dunlap, has been a member in good standing of the Texas State Bar since 2011. He has been counsel to over 700 wage and hour cases, most of which are multi-plaintiff actions. He's tried FLSA cases to a verdict, argued hundreds of motions, and taken hundreds of depositions. Texas Super Lawyers has named Andrew Dunlap a Rising Star from 2015 to 2022.

8. My co-counsel, Richard J. (Rex) Burch is the managing partner of Bruckner Burch, PLLC. He exclusively practices wage and hour individual, collective, and class actions nationwide. With over twenty years of experience, multiple Courts have commented favorably on his firm's work. For example, Judge Castillo of the Northern District of Illinois noted Bruckner Burch consists of "highly experienced attorneys [that] have acted as class counsel in similar actions in federal and state courts." *Schmidt v. Smith & Wollensky, LLC*, 268 F.R.D. 323, 328 (N.D. Ill. 2010); *see also, Girault v. Supersol 661 Amsterdam, LLC*, 1:11 CIV 6835 PAE, 2012 WL 2458172, \*2 (S.D.N.Y. June 28, 2012) (Bruckner Burch lawyers "are experienced and well-qualified employment lawyers and class action lawyers and have particular expertise in prosecuting and settling wage and hour class actions"); *Diaz v. Scores Holding Co., Inc.*, 07 CIV. 8718 THK, 2011 WL 6399468, at \*5 (S.D.N.Y. July 11, 2011)

(Bruckner Burch employs “experienced employment lawyers with good reputations among the employment law bar”).

9. I have been personally involved in this litigation against CLS on behalf of the class of ROW Agents paid a day rate since its inception. I have been counsel against CLS in numerous other class and collective actions throughout the nation.

10. Counsel has been diligent in pursuing the claims of its clients against CLS in recent years and continue to commit to this litigation.

11. Successful handling of cases such as this requires particularized expertise and experience, qualities possessed by Plaintiffs’ Counsel. Plaintiffs’ Counsel maintains a particular focus on wage and hour class litigation like this case.

12. Although Plaintiffs’ primary Counsel is based in Texas and Pennsylvania, all firms have a national docket of FLSA cases, with litigation across the United States, not only in Texas, but also in Georgia, California, Illinois, Louisiana, New Mexico, Ohio, Oklahoma, Pennsylvania, New York, Washington, North Carolina, Arizona, Florida, Virginia, Massachusetts, Maryland, West Virginia, Delaware, and elsewhere.

13. Plaintiffs’ Counsel’s experience has caused it to review and become familiar with a large body of documents and information concerning FLSA and state-law class litigation, which benefits cases such as this and maximizes the settlement value of the case. The firms’ experience in this field has also resulted in a familiarity with the evidence and testimony necessary to the successful prosecution of cases such as this. In all, Plaintiffs’ Counsel has secured hundreds of millions of dollars in settlements in FLSA cases for their clients.

14. If the Court grants Class Certification, Plaintiffs’ Counsel requests the Court appoint it as Class Counsel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signed on October 13, 2023

/s/ Richard M. Schreiber  
Richard M. Schreiber